

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

KEVIN FREYTAG,

Plaintiff,

v.

FORD MOTOR COMPANY,

Defendant.

Case No. 15-cv-13569

Honorable Victoria A. Roberts

Magistrate Judge Mona K. Majzoub

GASIOREK, MORGAN, GRECO,
McCAULEY & KOTZIAN, P.C.

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Counsel for Defendant

Joint Stipulation of Facts

Plaintiff Kevin Freytag and Defendant Ford Motor Company hereby jointly stipulate to the following facts:

1. Between March 17, 2014 and Plaintiff's termination on January 12, 2015, every request for a transfer made by (or on behalf of) Plaintiff Kevin Freytag

to Ford Motor Company—including, but not limited to, his request(s) for transfer that cited the Americans with Disabilities Act—was for a transfer that would have maintained Freytag’s full seniority, pay, and benefits.

2. Between March 17, 2014 and Plaintiff’s termination on January 12, 2015, Plaintiff Kevin Freytag never requested a transfer in which he proposed giving up any of his seniority, pay, or benefits.

/s/ David A. Kotzian (signed by permission)
DAVID A. KOTZIAN (P38308)
Attorney for Plaintiff

/s/ Thomas J. Davis
THOMAS J. DAVIS (P78626)
Attorney for Defendant

Dated: February 26, 2016

246163

CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2016, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to all parties on record.

s/Thomas J. Davis

Thomas J. Davis

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